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BEFORE THE

Federal Communications Commission

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WASHINGTON, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of   )
)
Amendment of the Commission's)   PR Docket No. 92-257
Rules Concerning Maritime   )
Communications   )
)

To: The Commission

COMMENTS OF APCO

The Associated Public-Safety Communications Officers,

Inc. ("APCO"), hereby submits the following comments in

response to the Commission's Notice of Proposed Rulemaking

in the above-captioned proceeding, FCC 92-497, released

November 30, 1992.

APCO is the nation's oldest and largest public safety

communications organization representing the interests of

all elements of the public safety land mobile radio

community. APCO has nearly 10,000 members involved in the

management and operation of radio communications systems for

police, fire, state and local government, emergency medical,

forestry conservation, highway maintenance, and other public

safety services. APCO is the FCC-certified Frequency

Coordinator for all Part 90 Police, Local Government and 420

MHz and 800 MHz Public Safety channels.

The Commission proposes to permit sharing of certain

VHF maritime channels by licenses in the Industrial/Land

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Transportation (I/LT) Radio Service on the theory that many
I/LT licensees are located in inland geographic areas in
which Maritime channels are not needed. Notice at ¶40. The
Commission also seeks comment, however, as to whether
sharing should be extended to Public Safety and Business
Radio Services.

APCO urges that a portion of the maritime channels in
question also be made available for public safety use on an
exclusive basis, shared only with Maritime Mobile in an
appropriate fashion. This would be consistent with the
statutorily mandated priority for public safety use of the
radio spectrum. Some of these Maritime channels have
already been made available for public safety use by
waiver.[1]

There is a severe shortage of VHF land mobile
frequencies available for public safety use in many parts of
the country. Some of those areas are far removed from
coastal regions and from navigable waters, and would be well
suited for use of VHF channels otherwise allocated for
Maritime radio. These VHF channels would be particularly
useful for wide-area public safety systems and for mobile
relay operations, especially in remote mountain and rural

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[1] APCO analysis of the FCC's database indicates that
there are approximately 100 public safety stations, plus
associated mobiles, licensed on the Maritime channels.

-2-

areas where frequencies higher in the spectrum may be unsuitable due to propagation characteristics.

Public safety users cannot share frequencies in the same geographic region with business and other non-public safety users who have fundamentally different approaches to interference protection and user priorities. Therefore, a portion of the Maritime channels made available for sharing should be designated for sharing only with public safety entities eligible in Part 90, Subpart B. Less restrictive sharing criteria would render the Maritime channels essentially useless for most public safety applications. APCO also suggests that, to the degree possible, assignment of _contiguous_ blocks of channels for public safety and for any other land mobile service would facilitate frequency coordination and usage.

While APCO urges the Commission to allow public safety sharing of the Maritime channels, it cautions that any private land mobile use of those channels must be consistent

CONCLUSION

For the reasons set forth above, APCO urges the Commission to permit exclusive sharing by public safety agencies of a portion of the Maritime channels made available for land mobile shared use in this proceeding, pending, however, the establishment of new private land mobile radio rules in PR Docket 92-235.